

1 Gustavo Ponce, Esq.
Nevada Bar No. 15084
2 Mona Amini, Esq.
Nevada Bar No. 15381
3 **KAZEROUNI LAW GROUP, APC**
6787 W. Tropicana Ave., Suite 250
4 Las Vegas, Nevada 89103
Telephone: (800) 400-6808
5 Facsimile: (800) 520-5523
E-mail: gustavo@kazlg.com
6 mona@kazlg.com

7 *Attorneys for Plaintiff,*
8 *Carol Hart*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **CAROL HART**, Individually and On
12 Behalf of All Others Similarly Situated,

13 **Plaintiff,**

14 **vs.**

15 **M&T BANK CORPORATION,**

16 **Defendants.**

Case No.: 2:24-cv-00921-MDC

**REQUEST TO EXTEND TIME FOR
DEFENDANT M&T BANK
CORPORATION TO ANSWER THE
INITIAL COMPLAINT**

(First Request)

17
18
19
20 ///

21 ///

22 ///

23

24

25

26

27

28

1 Plaintiff Carol Hart (“Plaintiff”) hereby files this unopposed Request for
2 Extension of Time for Defendant M&T Bank Corporation (“M&T”) to Answer the
3 initial complaint, and in support states as follows:

- 4 1. On May 16, 2024, Plaintiff filed the present lawsuit (Dkt. No. 1).
- 5 2. M&T was served with the Complaint on May 20, 2024.¹
- 6 3. M&T’s responsive pleading was due on June 10, 2024, and on that same
7 day, M&T requested an extension of time to respond to the Complaint which Plaintiff
8 agreed to grant, through and including August 12, 2024.
- 9 4. Plaintiff and M&T are actively engaged in case-resolution negotiations.
- 10 5. Plaintiff does not oppose an extension of M&T’s time to Answer the
11 Complaint so that the parties may devote their energies to resolving this matter. This
12 request is filed consistent with an agreement from M&T requesting the Court for an
13 extension of time to file its responsive pleading by sixty days, to August 12, 2024.
- 14 6. This request for an extension of time is not for delay.
- 15 7. This is M&T’s first extension of time and the requested extension does
16 not prejudice the parties.

17 ///

18 ///

19 ///

20
21
22
23
24
25
26
27
28 ¹ According to M&T’s records, service was effectuated on May 23, 2024, making its response due June 13, 2024.

1 8. For the foregoing reasons, Plaintiff requests that the Court issue an
2 order extending the date on which M&T must answer or otherwise respond to
3 Plaintiff's Complaint on or before August 12, 2024.

4 DATED this 12th day of June 2024.

KAZEROUNI LAW GROUP, APC

By: */s/ Gustavo Ponce* _____

GUSTAVO PONCE, ESQ.

MONA AMINI, ESQ.

6940 S. CIMARRON RD., SUITE 210

LAS VEGAS NEVADA 89113

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 06-18-24



CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on June 12, 2024, the foregoing Notice was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce
GUSTAVO PONCE, ESQ.
MONA AMINI, ESQ.
6940 S. CIMARRON RD., SUITE 210
LAS VEGAS NEVADA 89113
Attorneys for Plaintiff

